

where the reference discloses each element or step of the claim, the current Office Action fails to do so. Applicant is left to conjecture as to how the disclosure of the reference is being correlated with the specific recitations of the claims.

For example, at the top of page 3, the Office Action states that the Grealish patent discloses an internal parameter that links corresponding data with each other to form a record of data, and refers to Figure 3 of that patent. It is not apparent how Figure 3 can be interpreted to disclose this claimed feature. Referring to Figure 9 of the Grealish patent, Figure 3 is described under the heading "an exemplary display data flow structure." The patent explains that a display control module 37 stores and re-stores display data associated with an application program 36. A display state data module 38 provides the storage location for the display state data. It is not apparent how the explanation of these different *modules* for displaying data can be interpreted to be an internal *parameter* that links corresponding data with each other "to form a record of data." The Examiner is respectfully requested to explain, with particularity, how Figure 3 of the Grealish patent discloses this subject matter.

Another feature recited in claim 13 is a presentation device that displays statistical information about selected data in a spreadsheet user interface by designated category. The Office Action acknowledges that the Grealish patent does not disclose this claimed feature, and refers to the Keith patent, particularly at column 29, line 16 to column 30, line 65. It is respectfully submitted that the Keith patent does not disclose, nor otherwise suggest, the claimed subject matter. At column 29, lines 16-24, the patent discloses that statistical techniques, such as cluster analysis, can be applied to a map to aid in the identification of related clusters of entities. The Keith patent is directed to the presentation of data in a spatial

representation, e.g. a visual plot or graph. Figures 1-D and 2-12 illustrate examples of this form of data presentation. In this form of data presentation, the concept of clustering enables users to identify the relationship of different entities, based upon the Euclidean distance between them. In accordance with the above-noted passage from the Keith patent, statistical information about the entities is employed to assist in the identification of the clusters. It is not apparent how this teaching is to be applied to the subject matter of the Grealish patent. This patent discloses the display of data from a database in a tabular form, for example as shown in Figures 2a-2e. The Office Action does not explain any reason that would lead a person to apply the clustering techniques disposed in the Keith patent to this tabular type of display. Specifically, there is no apparent reason to apply it to a spreadsheet.

Furthermore, it is respectfully submitted that the statistical analysis discussed in the Keith patent is not the same as the claimed subject matter. Claim 13 recites a presentation device that displays statistical information "about the selected data" in a "spreadsheet user interface." The Keith patent does not disclose that statistical information *about* a set of data is displayed in a spreadsheet. Rather, it discloses that statistical *analysis* is employed to identify clusters. This information is then used to control the attributes of the spatial map. There is no display of statistical information in a spreadsheet user interface.

For at least the foregoing reasons, therefore, it is respectfully submitted that the Grealish and Keith patents do not suggest the claimed subject matter to a person of ordinary skill in the art. If the rejections are not withdrawn, it is respectfully submitted that Applicant is entitled to a detailed explanation of the manner in which the references are being interpreted to disclose every feature recited in the claims,

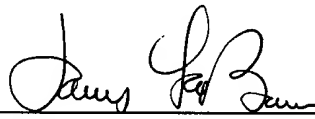
on an element-by-element basis. General references to figures that have no apparent relationship to the claimed elements do not satisfy the Examiner's burden for establishing a *prima facie* case of obviousness.

Reconsideration and withdrawal of the rejections, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

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